

From: Boyd Lemon [<mailto:blemon308@gmail.com>]
Sent: Monday, February 15, 2016 5:44 PM
To: Jeff Adams
Subject: Rezoning Application for Old Gillman Mill Site

Planning Commission of the City of St. Marys:

As a resident of downtown St. Marys, I fully support appropriate development of the old Gillman mill site, but it must be used in a way that safeguards the environment and quality-of-life of our citizens. At this time there are far too many unanswered questions to support the rezoning of the property sought by the applicant.

The only use mentioned by the applicant is as an industrial barge port.

- Amount of truck traffic: unknown
- Amount of rail traffic: unknown
- Amount of barge traffic: unknown
- The nature of the industries: unknown (On December 15, 2015, the developer, Mr. Chris Ragucci, stated that he really had no idea what these industries might be but, if we only would approve the rezoning, he was confident that some uses would be found.)
- The extent of the ability of the City to retain the right of approval for such industries: unknown
- The environmental impacts: unknown – and it is our understanding that no further no studies will be performed.
- Mitigation plans regarding toxic materials on the site: unknown

Most important, what control, if any, the City would have over the conduct of whatever industry uses the property is uncertain. Clearly some industries would be appropriate. Some would not. An industrial barge port on the St. Marys River adjacent to a residential area and within a few blocks of St. Marys Historic District would not.

We have heard much about how the City will maintain control regarding which industries may be established on the site. It should be noted that the *Coast Guard* issues permits for the handling of various types of cargoes – and the Coast Guard does NOT notify local governments when permits have been issued. One day the port may be shipping wood pellets, the next day it can be barging crude and flammable bio-fuels and hazardous materials. These materials may sit at a port for an indefinite period of time: in this case, a port that is perilously close to the downtown residential area and the St. Marys Elementary School.

The City of Fernandina Beach's experience with its port indicates that it is impossible to maintain control, and their port has had disastrous affects on the City. The City cannot control what is shipped once the port is established. St. Marys should not repeat their mistake.

What is known, from the 2003 environmental assessment, is that the site contains such toxic chemicals as Chromium, Barium, vanadium, sulfuric acid, hydrochloric acid, polychlorinated biphenyl...to name but a few. Mr. Ragucci has not offered any information at all about clean-up plans: he's unable to for until it's rezoned he has no idea what industries might be interested. In order to protect the citizens of St. Marys,

the City must stipulate that, before considering rezoning, a comprehensive clean-up proposal must be submitted and thoroughly vetted by experts.

The Planning Commission is charged with analyzing rezoning applications by following the ten-point Zoning Amendment Criteria.

The zoning request should be a logical extension of a zoning boundary which would improve the pattern of uses in general area. We cannot imagine how an industrial barge port could possibly be considered a logical extension of a zoning boundary or improve the pattern of use in a residential area. Consider the noise, traffic, airborne contaminants, lighting, etc. involved in a large industrial barge port abutting well-maintained single-family homes.

The fourth criterion stipulates that “the request should not create traffic which would traverse established single-family neighborhoods on minor streets, leading to congestion, noise and traffic hazards.” The developer has only stated that the amount of truck traffic is unknown although it will be “considerable” and that there will be “lots and lots of trains.”

Reviewing the remaining rezoning criteria, many issues and questions arise. Population growth is dependent, in large part, upon the assets and quality of life presented by the city. Will an industrial barge port enhance these factors? That is unknown.

The short-term goal of “offloading” the property could completely destroy any more reasonable future options.

#9 states “This request should not result in changes to market values and/or tax rates of nearby properties.” It is hard to understand how property values would not be negatively impacted considering the noise, traffic, lights, dust, toxins, the activation of train access, etc., involved with industrial barge ports. We have been told that primary Port access would be along Finley St. What of the residents in that area: their property values, safety and quality of life? What impacts will be experienced by the residents of the downtown area in general? Heavy truck and train traffic could impede essential emergency services, impact the infrastructure (roads), and also have an adverse effect on residential property values.

#10 states “The request should conform to policies and recommendations contained in the St. Marys/Camden County Comprehensive Plan.”

We suggest that everyone familiarize themselves with the St. Marys Mainstreet/Downtown Visioning Plan Feb. 1, 2016, presentation. The City is justifiably proud of the lengths to which it went to gather public input about the direction in which our town should go, existing assets and so forth. Note the prevalence of words like “ecotourism”, “charm”, “history”, “peaceful” etc. How will an industrial barge port with heavy truck and rail traffic, noise/dust/light pollution, and mystery-industries adhere to the stated “vision” for the downtown area?

The “facts” change with every presentation. First Mr. Ragucci spoke of an LNG (liquid natural gas) facility and a pipeline to St. Marys. (He quickly back-pedaled when questioned about his statements to the media about that.) Then he downsized the potential jobs from 5,000+ to “hundreds...maybe. In our dreams.” Then he talked about “wood pellet processing.”

In conclusion, in the face of so many unknown variables, the absence of a clear clean-up plan, and in the light of the expressed will of the citizens of St. Marys regarding the vision for our future, I urge the Planning Commission to deny the applicant's zoning change.

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